

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Shannon Donald Sexton

Case No. Case: 2:23-mj-30460
Assigned To : Unassigned
Assign. Date : 11/20/2023
USA V. SEXTON (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2023 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 USC Section 2113

Offense Description
Bank Robbery

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 20, 2023

City and state: Detroit, Michigan



Complainant's signature

Special Agent, Sean Callaghan (FBI)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Sean Callaghan, being duly sworn, states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have investigated a variety of federal criminal violations, including violent crime, bank robberies, crimes against children and various financial crimes, for approximately 20 years. I am currently assigned to the Detroit Division, Oakland County Resident Agency.
2. The information contained in this affidavit is based on my personal knowledge and observations, reports that I have reviewed, documents and information provided by witnesses interviewed during this investigation. The witnesses who were interviewed by officers and/or agents pursuant to this investigation provided complete identification information which I maintain (none were anonymous sources). However, I am identifying them in this affidavit, which will become public, only by their initials to protect their identities. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I didn't include every fact I know concerning this investigation, but only the facts that I believe are necessary to establish probable cause to believe that Shannon Donald Sexton committed bank robbery in violation of Title 18 U.S.C. Section 2113.

3. On October 19, 2023, at approximately 4:00 p.m., a man entered the Vibe Credit Union located at 6580 Dixie Highway in Independence Township. The man approached the teller station of victim J.N. and presented a demand note which read, “this is a robbery empty the drawer.” J.N. complied with the demand by opening her teller drawer and providing the man with all of the cash that was inside it. The man placed the cash in a plastic bag and exited the bank. J.N. and other witnesses at the bank described the robber as a short, white male, wearing a bright neon yellow/green hoodie, sunglasses and a surgical face mask. A total of \$1,017.00 was taken.

4. Deputies from the Oakland County Sheriff’s Office (OCSO) were dispatched to the bank and received a description of the suspect. A review of surveillance images from the bank showed that the suspect fled in the direction of the Taco Bell located just north of the bank.

5. Investigators obtained and reviewed surveillance video from the Taco Bell for the relevant time. On the video, investigators saw a silver Mitsubishi Mirage pull into the parking lot of the Speedway gas station located just north of the Taco Bell. The video showed an individual wearing a neon yellow/green hoodie exit the vehicle just before 4:00 p.m.

walking southbound past the front of the Taco Bell toward the Vibe Credit Union. The video then showed what appeared to be the same individual wearing the same neon yellow/green hoodie running from behind the Taco Bell heading north toward the Speedway gas station at approximately 4:10 p.m. The individual then got back in the silver Mitsubishi Mirage and drove away.

6. Investigators utilized the Flock Safety Vehicle Camera system which revealed a 2021 Mitsubishi Mirage, bearing Michigan license plate number ELL3704, entering Independence Township on Northbound Dixie Highway at Andersonville Road on October 19, 2023 at 3:34PM. Investigators then determined via Michigan SOS that this plate was registered to EAN Holdings, LLC, the company that owns the Enterprise Rent-A-Car car rental company.

7. Investigators again utilized Flock Safety Vehicle Camera systems to search for MI plate number ELL3704 within the month of October 2023. The search returned images of the Mitsubishi Mirage being driven by a person wearing a neon yellow/green top on at least one occasion between October 13 – 19, 2023.

8. Detective Mance from the Oakland County Sheriff's Office (OCSO) contacted Enterprise who advised that the vehicle was currently leased to Shannon Donald Sexton, a white male weighing 142 lbs. and 5'3" in height. The vehicle was leased on October 9, 2023 and scheduled to be returned on October 23, 2023.

9. On October 20, 2023, OCSO set up an alert in the Flock Safety Vehicle Camera system for Michigan plate ELL3704. The vehicle/plate was captured driving in the city of Pontiac on October 20, 2023 at 11:48AM. A "be on the lookout" (BOLO) was broadcast to OCSO units in Pontiac and surrounding areas. An OCSO deputy observed the suspect vehicle traveling westbound on Augusta Avenue from Sanderson Avenue in Pontiac, Michigan. After confirming that the suspect, Sexton, was driving the vehicle, the deputy activated his emergency lights and the vehicle pulled into the driveway of 185 Augusta Avenue. Sexton began to exit the vehicle in an apparent attempt to flee and was ordered back into the vehicle until backup deputies arrived on the scene and placed him under arrest.

10. While inside the vehicle, Sexton appeared to be concealing items near the driver door and driver seat despite being instructed several

times to keep his hands outside the vehicle. A subsequent search of the vehicle revealed a white rocky substance in the door pocket of the driver door of suspected cocaine.

11. Vibe Credit Union is insured by the National Credit Union Administration (NCUA).

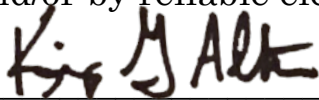
12. Based on the foregoing, there is probable cause to believe that Shannon Donald Sexton committed the offense of bank robbery in violation of Title 18 U.S.C. Section 2113.

Respectfully submitted,



Sean Callaghan, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE
DATE:

November 20, 2023